<center>REMARKS</center>

Claims 23-32, 34-63, 65-82, and 84-100 are pending in this application. Claims 1-22 and 101-236 were previously withdrawn by the Examiner. Applicants have canceled claims 33, 64, and 83. Applicants have amended claims 23, 32, 63, and 82 to incorporate subject matter of dependent claims 33, 64, and 83 and to more particularly point out and distinctly claim Applicants' portfolio management and analysis techniques. No new matter has been introduced by way of these amendments.

Interview

As a preliminary matter, Applicants thank the Examiner for his time and courteousness extended to Applicants' representative in a recent phone interview on September 3, 2009. In that interview, Applicants' representative and the Examiner discussed the differences between the independent claims and the cited references. Although no agreement was reached, proposed claim language was discussed in follow-up conversations directed to clarifying the types of objects being manipulated by Applicants' system and the concurrency aspect. This language has been incorporated into the Amendments herein.

Restriction Requirement

Applicants again thank the Examiner for his consideration of Applicants' arguments to the Second Restriction Requirement and for his re-joining of claims 23-31 into elected Group II.

Objections to the Specification

Applicants thank the Examiner for withdrawing the objection to the Abstract.

35 U.S.C. §112, Second Paragraph Claim Rejections

Applicants also thank the Examiner for withdrawing the 35 U.S.C. §112 rejections to claims 32, 41, 43, 71, 72, 90, and 91.

25315

CUSTOMER NUMBER

43

SRNA-1-2401AM2

BLACK LOWE & GRAHAM ᴾᴸᴸᶜ

701 Fifth Avenue, Suite 4800
Seattle, Washington 98104
206.381.3300 • F: 206.381.3301

<u>35 U.S.C. § 103 Rejections</u>

The Examiner has rejected claims 23-100 under 35 U.S.C § 103(a) as being unpatentable over Azuma, U.S. Patent No. 6,954,761 (hereinafter "Azuma") in view of Hoffman, U.S. Patent No. 6,253,191 (hereinafter "Hoffman").

The Examiner appears to be equating Azuma's enterprise information filtering system with various aspects of the portfolio management and analysis techniques recited in claims 23-100 and draws the conclusion that, therefore, Azuma somehow teaches, suggests, or motivates Applicants' claimed invention. The Examiner admits, however, that Azuma doesn't have anything to do with financial portfolios. The Examiner then looks to Hoffman for the missing information, asserting that Hoffman's Brownfield investments constitute financial investments and can be combined with Azuma's system to teach Applicants' invention. Applicants respectfully traverse all these rejections for at least the reasons discussed in detail below with respect to the Applicants' claims.

Although Applicants believe that the claims as previously amended were allowable over this combination of references, Applicants' have further amended the claims to expedite prosecution in accordance with amendments discussed with the Examiner. In particular, Applicants have amended each of the independent claims to clarify that the portfolio representation structure is an object instance hierarchical structure that contains data from two different investment types and that online transaction processing of such data occurs concurrently while supporting online analysis. These aspects were already present in dependent claims.

Specifically, claim 23 (and, by virtue of incorporation, dependent claims 24-31) as amended recites,

> ... a portfolio representation structure instantiated and stored in the memory *as an object instance hierarchy* that contains enterprise portfolio data from different types of investments, *the enterprise portfolio data including financial investments and non-financial investments*; ... and

> a portfolio analyzer component ... that is configured, when executed, to present a plurality of views ... wherein the views dynamically calculate and *present multidimensional characterizations of the enterprise portfolio data while items are*

25315
CUSTOMER NUMBER

44

SRNA-1-2401AM2

BLACK LOWE & GRAHAM ᴾᴸᴸᶜ

701 Fifth Avenue, Suite 4800
Seattle, Washington 98104
206.381.3300 • F: 206.381.3301

> *added* using the portfolio manager, ***thereby concurrently providing online transaction processing while supporting online analysis.***

(emphasis added).

Similarly, claims 32, 63, and 82 (and, by virtue of incorporation, dependent claims 34-62, 65-81, and 84-100) as amended recite,

> ...***instantiating a hierarchy of object instances,*** each object instance representing an investment of the organization... ***such that data from at least a first investment type and data from at least a second investment type,*** the first investment type different from the second investment type, ***are contained as different object instances in the same object instance hierarchy;*** ...and

> processing changes to the hierarchy of object instances while displaying the object instances that match the attribute specification, thereby ***concurrently allowing online transaction processing while supporting online analysis.***

or similar language (emphasis added).

Neither of these aspects are taught, suggested, or motivated by either Azuma or Hoffman, alone or in any motivated combination. Since neither reference teaches these aspects, their combination cannot possibly teach something non-existent in either reference.

Simply put, nowhere does Azuma or Hoffman teach or suggest a hierarchy of object instances, each object instance representing an investment of the organization ... such that data from at least a first investment type and data from at least a second investment type, the first investment type different from the second investment type, are contained as different object instances in the same object instance hierarchy. Contrary to the Examiner's assertion that "programming involves the need to instantiate a hierarchy of object instances and it is inherent in programming that one does so – further to be able to program object instances one must be able to manage the objects in a meta structure," a hierarchy of object instances where the instances are of different types is not inherent in programming. (See Office Action, dated June 4, 2009, p. 3.) Instances of objects in traditional object-oriented programming instantiate objects of the same type – not different types. As explained in the Examiner interview, Applicants' techniques explicitly use a structure called a "meta-object" in order to be able to include different types of objects in the same object instance hierarchy. (See Specification, p. 9, lines 2-26.) Applicants therefore incorporate all of their prior arguments from their prior response (Amendment, dated

25315

CUSTOMER NUMBER

45

SRNA-1-2401AM2

BLACK LOWE & GRAHAM ᴾᴸᴸᶜ

701 Fifth Avenue, Suite 4800
Seattle, Washington 98104
206.381.3300 • F: 206.381.3301

August 22, 2008), including that these references do not teach, suggest, or motive the portfolio representation structure of Applicants' claims in view of the Specification. The Examiner is required to view the claims with "broadest reasonable interpretation **consistent with the specification**." (See MPEP 2111 (Emphasis added).)

In addition, nowhere does Azuma or Hoffman teach or suggest concurrently allowing online transaction processing of two different types of investment data (*e.g.*, financial data and non-financial data in claim 23 or the two different types of investment data in claims 32, 63, and 82) while supporting online analysis of the same data. It is simply not present. At most Azuma describes an ability to change a definition of a filter definition automatically by changing the definitional information of a person or organization. (*See* Azuma, column 12, lines, 12-54.) Changing a "filter" is not the same as "online analysis" of "investment data" nor is changing the definitional information of a person or organization the same as "online transaction processing" of "investment data" as recited in Applicants' claims. As explained in Applicants' Specification, in order to analyze data in prior on-line analysis processing packages (OLAP packages), the system is taken off-line and the data structures are recalculated to prepare for additional analysis. (Specification, p. 2, line 23 – p. 3, line 5.) Thus, Azuma does not teach or suggest this concurrency aspect.

Therefore, neither Azuma nor Hoffman, alone or in any motivated combination teaches, suggests, or motivates at least one aspect of claims 23-32, 34-63, 65-82, and 84-100. Accordingly, claims 23-32, 34-63, 65-82, and 84-100 are not anticipated or obvious over the cited references.

Dependent Claims

The dependent claims 24-31, 34-62, 65-81, and 84-100 are not anticipated for at least the reasons discussed above with reference to claims 23, 32, 63, and 82. Furthermore, various of the dependent claims recite additional aspects that are not taught, suggested, or motivated by Azuma. In addition, the dependent claim rejections also present additional issues. In the interests of expediting prosecution, Applicants are not commenting on each of these at this time. Applicants note for the record that all such assertions are traversed and reserve the right to

25315
CUSTOMER NUMBER

46

SRNA-1-2401AM2

BLACK LOWE & GRAHAM ᴾᴸᴸᶜ

701 Fifth Avenue, Suite 4800
Seattle, Washington 98104
206.381.3300 • F: 206.381.3301

or taught by the cited references at a later time, should such become necessary. Specifically, no waiver (legal, factual, or otherwise), implicit or explicit, is hereby intended.

Conclusion

In view of the foregoing, Applicants submit that all of the claims in this application are allowable over the cited references. In the event the Examiner disagrees or finds minor informalities, Applicants respectfully request a telephone interview to discuss the Examiner's issues and to expeditiously resolve prosecution of this application. Applicants' representative can be contacted at (206) 381-3300.

In closing, Applicants respectfully request the Examiner to enter these amendments and to reconsider this application and its early allowance. The Director is authorized to charge any additional fees due by way of this Amendment, or credit any overpayment, to our Deposit Account No. 50-1050. Again, Applicants' representative thanks the Examiner for his prompt and courteous attention.

Respectfully submitted,

BLACK LOWE & GRAHAM[PLLC]

Ellen M. Bierman
Registration No. 38,079

EMB:kp

25315
CUSTOMER NUMBER

47

SRNA-1-2401AM2

BLACK LOWE & GRAHAM [PLLC]

701 Fifth Avenue, Suite 4800
Seattle, Washington 98104
206.381.3300 • F: 206.381.3301